

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SHADEESHA BROWN and GABRIEL PEREZ,	:
	:
Plaintiffs,	:
	:
- against -	:
	:
THE CITY OF NEW YORK, BRIAN McALEAR,	:
KEITH HOCKADAY, FREDERICO MARTINEZ,	:
JOAQUIN MORALES, ROBERT DOWNES,	:
THOMAS ALBANO, GERARD FLOOD, WILLIAM	:
HART, TIMOTHY MURPHY, KENYETTA ROUSE,	:
and THOMAS LONGA,	:
	:
Defendants	:
-----X	

11CV1068(AJN)

**DECLARATION OF  
RICHARD A. ASHMAN**

RICHARD A. ASHMAN, an attorney admitted to practice before the Courts of the State of New York and before this Court, declares, under penalty of perjury, pursuant to 28 U.S.C. §1746, the following:

1. I am associated with the firm of Michelstein & Associates, PLLC, attorneys for plaintiff Shadeesha Brown in the above-captioned matter.
2. I respectfully submit this Declaration and the exhibits annexed hereto in opposition to the defendants' motion *in limine*.
3. Attached hereto as Exhibit 1 is a true and correct copy of plaintiff's Amended Complaint filed in this action.
4. Attached here as Exhibit 2 is a true and correct copy of the plaintiff Shadeesha Brown's Notice of Claim dated August 16, 2010 in this action.

5. Attached here as Exhibit 3 is a true and correct copy of the parties' Joint Pre-Trial Order filed on April 8, 2013, in this matter.

Dated: April 22, 2013

s/ Richard A. Ashman

Richard A. Ashman (RA5389)